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May 18, 2021

LETTER-MOTION, ON CONSENT,  
TO SET NEW DATE FOR STATUS CONFERENCE

Filed via ECF

Hon. Naomi Reice Buchwald, Senior U.S.D.J.  
Moynihan United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007

Re: United States v. Tsani Russell, 19-cr-554(NRB)

Dear Judge Buchwald:

This letter-motion is respectfully submitted—with the consent of the United States—to continue the date of the present status conference (tomorrow, May 19, at 12:00 noon) to a convenient date in approximately 14 days. Without going into unnecessary detail or privileged discussions, it is the emphatic view of defense counsel that a face-to-face meeting with Mr. Russell to discuss the status of the case and whether there will be an agreed-upon disposition is necessary. MCC has recently resumed attorney visitation and, if this application is granted, one will be scheduled with Mr. Russell as soon as practicable. Counsel expect to be able to report back to Your Honor definitively in 14 days.

Your Honor's time and attention to this matter is appreciated.

Respectfully yours,  
/s/ David A. Ruhnke  
David A. Ruhnke (Ruhnke & Barrett)  
Diane Ferrone (Law Offices of Diane Ferrone)  
Counsel to Tsani Russell

cc via ECF: Jeffrey Coffman, A.U.S.A.

ENDORSEMENT

*The conference is adjourned  
until June 7, 2021 at 10:30am.  
Speedy trial time included.  
18 U.S.C. § 3161(h)(7)(A).*

*So ordered.*

*Naomi Reice Buchwald,  
U.S.D.J.  
5/18/21*